

1 BARRY J. PORTMAN
Federal Public Defender
2 LARA S. VINNARD
Assistant Federal Public Defender
3 160 West Santa Clara Street, Suite 575
San Jose, CA 95113
4 Telephone: (408) 291-7753
5 Counsel for Defendant CALERO-LOPEZ

6
7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,) No. CR 08-70029 HRL
12)
Plaintiff,)
13) **STIPULATION TO EXTEND TIME FOR**
v.) **PRELIMINARY HEARING AND**
14) **EXCLUDE TIME**
ALONSO CALERO-LOPEZ,)
15)
Defendant.)
16)

17 Defendant and the government, through their respective counsel, hereby stipulate that,
18 subject to the court's approval, the hearing in the above-captioned matter, presently scheduled for
19 Thursday, March 27, 2008, at 1:30 p.m. be continued to Thursday, April 24, 2008, at 1:30 p.m.
20 The continuance is requested to allow time for further pre-charge negotiation and defense
21 investigation.

22 The parties further agree that time should be excluded under the Speedy Trial Act from
23 March 27, 2008 to April 24, 2008, to allow time for defense investigation and preparation, and
24 because the ends of justice outweigh the defendant's and the public's need for a speedy trial.

25 Finally, in order to allow additional time for pre-charge negotiations, the parties also
26 agree that time should be extended for the defendant's preliminary hearing pursuant to Federal

1 Rule of Criminal Procedure 5.1(d), taking into account the public interest in the prompt
2 disposition of criminal cases.

3
4 Dated: 03/25/08

/s/
LARA S. VINNARD
Assistant Federal Public Defender

5
6 Dated: 3/25/08

/s/
TOM O'CONNELL
Assistant United States Attorney